

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**CHARLENE CARTER,** §  
§  
§  
**Plaintiff,** § **Civil Action No. 03:17-cv-02278-S**  
v. §  
§  
**SOUTHWEST AIRLINES CO., AND** §  
**TRANSPORT WORKERS UNION** §  
**OF AMERICA LOCAL 556,** §  
§  
**Local 556s.** §

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**DEFENDANT TWU LOCAL 556'S UNOPPOSED MOTION TO  
EXTEND THE DISPOSITIVE MOTION DEADLINE**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant Transport Workers Union of America Local 556 (“Defendant” or “TWU Local 556”), by and through their undersigned counsel, requests on behalf of all parties, that the Court grant a one week extension to comply with the Court’s dispositive motion deadline (Doc. 89), extending the deadline from **May 5, 2021 to May 12, 2021**. In support of this motion, Defendant states as follows:

1. Defendant TWU Local 556 requests this extension due to family medical related reasons.
2. On April 27, 2021, Counsel’s three-year old son fractured the radial shaft of his left arm, keeping him out of school for two days.
3. On or about May 2, 2021, Counsel’s one-year old son took fever and is currently being withheld from day-care.
4. Counsel is the primary care for his children when they are ill and home from school.

5. Counsel's for all parties conferred via email and came to the agreement that the deadline should be extended for all parties.
6. The following demonstrates there is good cause to grant the extension. This motion is not filed for the purpose of delay, but so that justice and safety may be done.
7. For the foregoing reasons, the Parties require and request additional time to extend the deadline for filing dispositive motions.

Respectfully submitted,

Date: May 4, 2021

/s/ Adam S. Greenfield

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**COUNSEL FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I undersigned hereby certifies that on May 4, 2021, a true and correct copy of the foregoing document was served via the ECF notification on Defendant's counsel of record.

/s/ Adam S. Greenfield  
Adam S. Greenfield

**CERTIFICATE OF CONFERENCE**

Defendant's counsel, Adam S. Greenfield, conferred via email with Plaintiff's counsel, Matthew Gilliam, and Defendant Southwest Airlines counsel, Michael Correll on May 4, 2021. The parties agreed to extend the deadline for all parties.

/s/ Adam S. Greenfield

Adam S. Greenfield